

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

PHILIP GODLEWSKI,	:	
Plaintiff,	:	
	:	
v.	:	3:24-CV-344-JKM
	:	Judge Julia K. Munley
EDUARDO NICOLAS ALVEAR	:	
GONZALEZ, a/k/a ALVEAR GONZALEZ	:	
EDUARDO NICOLAS, a/k/a	:	
NICOLAS ALVEAR, and	:	
GOOD LION TV, LLC,	:	
Defendant.	:	JURY TRIAL DEMANDED

AFFIDAVIT OF PLAINTIFF PHILIP GODLEWSKI

COMES NOW Plaintiff Philip Godlewski who deposes and says as follows:

1. I make my living, in part, as a social media personality who receives commissions based on advertising.

2. One of my major affiliate advertisers is Goldco, a firm that offers tax-deferred retirement plans backed by precious metals instead of more conventional securities-backed plans. Goldco pays commissions to me as a result of contacts generated via my social media from persons who roll their conventional retirement plans over to precious metals backed plans.

3. The following information is exemplary of the commissions I received from Goldco prior to Defendants' defamatory statements about me:

October 2023	\$1,347,462.62
November 2023	\$1,537,473.68
December 2023	\$1,035,078.90

Exhibit 1

4. In December 2023, Defendants began making defamatory statements concerning me on social media. These statements asserted, among other things, that I was a pedophile who was convicted of having sex with a minor.

5. As a direct and proximate result of Defendants' defamatory statements, Goldco demanded a 60 pause in the advertising partnership.


6. As a result of Defendants' defamatory statements, my commissions were greatly reduced as indicated here:

January 2024	\$501,096.23
February 2024	\$564,575.03
March 2024	\$264,331.13
April 2024	\$978,252.74

7. I estimate that, as a direct and proximate result of Defendants' defamatory statements, I have lost in excess of \$2,000,000 in revenue from Goldco alone.

I hereby verify that the statements in the foregoing document are true and correct. I understand that false statements made herein are subject to the penalties of 18 Pa.C.S.A. 4904 relating to unsworn falsification to authorities.

Date: **5/24/2024**



Philip Godlewski